UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

)	
In re:)	Chapter 11
GRIDDY ENERGY LLC,)	Case No. 21-30923
Debtor.)	(Jointly Administered)
)	

STIPULATION BETWEEN ERCOT AND CLASS ACTION CREDITORS

Creditor Lisa Khoury and the proposed class action creditors ("Class Action Creditors"), and the Electric Reliability Council of Texas, Inc. ("ERCOT" and together with the Class Action Creditors, the "Parties") enter into this stipulation (the "Stipulation") and agree as follows:

- 1. On April 1, 2021, the Class Action Creditors served ERCOT with a Notice of Subpoena (the "Subpoena") requesting the production of documents pursuant to FED. R. BANKR. P. 2004.
- 2. The Parties stipulate and agree that the deadline for ERCOT to object, move for a protective order, or otherwise respond to the Subpoena shall be May 3, 2021.
- 3. The Stipulation is intended by the Parties to be binding upon their successors, agents, assigns, including bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.
- 4. The Bankruptcy Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation.

STIPULATED AND AGREED TO THIS 9TH DAY OF APRIL, 2021:

THE POTTS LAW FIRM, LLP

By: /s/ Derek H. Potts

Derek H. Potts

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